

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2020 DEC 29 PM 2:20

DEPUTY CLERK

OR

UNITED STATES OF AMERICA

v.

MICHAEL SUI

Criminal No. 3:20-CR-

3-20CR0630-M

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or about August 2019, the exact date being unknown to the Grand Jury, and continuing through October 29, 2020, in the Dallas Division of the Northern District of Texas and elsewhere, **MICHAEL SUI**, the defendant herein, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with other persons known and unknown, to commit certain offenses against the United States, to-wit: to possess with the intent to distribute and to distribute less than 50 kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(D).

All in violation of 21 U.S.C. § 846.

Count Two

Possessing a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c)(1)(A)(i))

On or about October 29, 2020, in the Dallas Division of the Northern District of Texas, **MICHAEL SUI**, the defendant, in furtherance of the commission of a drug trafficking crime, namely, conspiracy to possess with the intent to distribute and to distribute less than 50 kilograms of a mixture or substance containing a detectable amount of marijuana as alleged in Count One of this indictment, a Count for which the defendant may be prosecuted in a court in the United States, did knowingly possesses a firearm, to-wit: (1) Ruger, Model Mark IV Hunter, .22 caliber, semi-automatic pistol, bearing serial number 500208344.

In violation of 18 U.S.C. § 924(c)(1)(A)(i) and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Forfeiture Notice

21 U.S.C. §§ 853, 881(a) and 18 U.S.C. § 924(d)

Pursuant to 21 U.S.C. § 853(a), upon conviction of the Counts One offense(s), the defendant, **MICHAEL SUI**, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the Count One offense(s), and any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the Counts One offense(s), including but not limited to the following the items seized on or about October 29, 2020:

- (1) \$28,900.00 of United States currency;
- (2) two items of jewelry; and,
- (3) A silver 2018 Ford Fiesta, VIN: 3FADP4BJ8JM106212, bearing Texas registration MJN1910

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction for the offense alleged in Count Two, defendant **MICHAEL SUI**, shall forfeit to the United States any firearm and ammunition involved in or used in the willful commission of the offense, including but not limited to the following:

- (1) A Ruger, Model Mark IV Hunter, .22 caliber, semi-automatic pistol, bearing serial number 500208344; and,
- (2) all assorted ammunition and magazines seized with those handguns.

Pursuant to 21 U.S.C. § 853(p), if any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,

the United States intends to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



JOHN KULL
Assistant United States Attorney
Texas State Bar No. 00791057
1100 Commerce St., Suite 300
Dallas, Texas 75242
John.Kull@usdoj.gov
Phone: 214.659.8600

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

MICHAEL SUI

INDICTMENT

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Count 1)

18 U.S.C. § 924(c)(1)(A)(i)

Possessing a Firearm in Furtherance of a Drug Trafficking Crime
(Count 2)

21 U.S.C. §§ 853, 881(a) and 18 U.S.C. § 924(d)
Forfeiture Notice

2 Counts

A true bill rendered



DALLAS

FOREPERSON

Filed in open court this 29 day of December, 2020.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending